

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AARON SIEGEL;	)	
	)	
JASON COOK;	)	
	)	
JOSEPH DELUCA;	)	
	)	
NICOLE CUOZZO;	)	
	)	
TIMOTHY VARGA;	)	
	)	
CHRISTOPHER STAMOS;	)	Civil Action No. 1:22-cv-07463-KMW-AMD
	)	
KIM HENRY; <i>and</i>	)	
	)	
ASSOCIATION OF NEW JERSEY RIFLE	)	
& PISTOL CLUBS, INC.,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	
	)	
MATTHEW PLATKIN, in his official	)	
capacity as Attorney General of New Jersey,	)	
	)	
PATRICK J. CALLAHAN, in his official	)	
capacity as Superintendent of the New Jersey	)	
Division of State Police,	)	
	)	
<i>Defendants.</i>	)	
	)	

**NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER AND  
FOR A PRELIMINARY INJUNCTION**

TO: Angela Cai, Esq.  
Office of the Attorney General  
Department of Law and Public Safety  
Division of Law  
25 Market Street  
Trenton, NJ 08625

**PLEASE TAKE NOTICE**, that pursuant to this Court’s Scheduling order (ECF No. 6) Plaintiffs, Aaron Siegel, Jason Cook, Joseph DeLuca, Nicole Cuzzo, Timothy Varga, Christopher Stamos, Kim Henry, and Association of New Jersey Rifle & Pistol Clubs, Inc. (collectively “Plaintiffs”) shall move before the Honorable Karen M. Williams, U.S.D.J., at the United States Courthouse, Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets, Camden, NJ 08101, for an Order granting a temporary restraining order and preliminary injunction, pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, enjoining the operation and effect of certain provisions of New Jersey Assembly Bill No. A4769 and other provisions of New Jersey law as set forth in the filed Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, Plaintiffs shall rely upon the following documents:

- 1) Declaration of Aaron Siegel,
- 2) Declaration of Jason Cook,
- 3) Declaration of Timothy Varga,
- 4) Declaration of Christopher Stamos,
- 5) Declaration of Nicole Cuzzo,
- 6) Declaration of Joseph DeLuca,
- 7) Declaration of Kim Henry,
- 8) Declaration of Scott Bach,
- 9) Declaration of Daniel L. Schmutter, and
- 10) Brief.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument.

**PLEASE TAKE FURTHER NOTICE** that two proposed forms of Order are submitted

herewith: one granting a temporary restraining order and the other granting a preliminary injunction.

Dated: December 23, 2022

Respectfully submitted,

s/ Daniel L. Schmutter  
Daniel L. Schmutter  
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